

STARK & STARK

A Professional Corporation

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Attorneys for Defendants, Bail Integrity Solutions, Inc. and Thomas Brian Shirah

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MICROBILT CORPORATION,

Plaintiff,

v.

BAIL INTEGRITY SOLUTIONS, INC. and
THOMAS BRIAN SHIRAH in his individual
capacity; ABC COMPANIES (1-10), JOHN
and JANE DOES (1-10),

Defendants.

CIVIL ACTION NO.
3:19-CV-00637 (MAS)(LHG)

**DECLARATION OF CRAIG S. HILLIARD
IN SUPPORT OF DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Craig S. Hilliard, do hereby declare as follows:

1. I am a shareholder of the law firm Stark & Stark, P.C., counsel to defendants in this action. I make this Declaration in support of defendants' motion for partial summary judgment under Fed.R.Civ.P. 56.

2. Attached hereto as Exhibit "A" is a copy of the Complaint filed by plaintiff, Microbilt Corporation ("Microbilt") in this action.

3. Attached hereto as Exhibit “B” is a copy of Microbilt’s certified Answers to Defendants’ First Set of Interrogatories.

4. Attached hereto as Exhibit “C” is a copy of defendants’ Rule 30(b)(6) notice for the deposition of Microbilt.

5. Microbilt designated its CEO, Walter Wojciechowski, as its Rule 30(b)(6) designee on all topics listed in the Rule 30(b)(6) notice.

6. Attached hereto as Exhibit “D” are excerpts from the deposition of Mr. Wojciechowski.

7. Attached hereto as Exhibit “E” are excerpts from the deposition of Matthew Roesly.

8. Attached hereto as Exhibit “F” are excerpts from the deposition of Michael Woody.

9. Attached hereto as Exhibit “G” are excerpts from the deposition of Joshua Norvell.

10. Attached hereto as Exhibit “H” is the “Letter of Intent” referred to and attached as an exhibit to the Complaint and marked as Exhibit “1” during the deposition of Michael Woody.

11. Attached hereto as Exhibit “I” is the “Application for Access” referred to and attached as an exhibit to the Complaint and marked as Exhibit “2” during the deposition of Michael Woody.

12. Attached hereto as Exhibit “J” is the “User Agreement” and accompanying “Addendum” attached as an exhibit to the Complaint and marked as Exhibit “3” during the deposition of Michael Woody.

13. Attached hereto as Exhibit “K” is a series of e-mails in January 2019 produced in discovery by Microbilt (Bates MB 519-527) and marked as Exhibit “18” during the deposition of Matthew Roesly and Walter Wojciechowski.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing statements are true and correct.

s/ *Craig S. Hilliard*
CRAIG S. HILLIARD

Dated: December 14, 2020